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September 10, 2026

Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Mike McNiven
Senior Regulatory Advisor & Board Secretary

Re: Application for Exemption to Regulation 17 – Temporary Restriction for Load Additions in Labrador East and West – Carol Automobile Ltd.

On July 27, 2026, Newfoundland and Labrador Hydro ("Hydro") filed an application requesting approval of an exemption to Regulation 17 to permit service to Carol Automobile Ltd. in Labrador City. Hydro received a request from Carol Automobile Ltd. for an additional electric vehicle charger with an estimated peak demand of 240 kW. Hydro previously approved service to this customer at the same location in 2021 with an estimated peak demand of 16.4 kW. As Regulation 17 applies not only to single service requests exceeding 200 kW but also to multiple service requests made by the same customer during the period the regulation remains in effect, the cumulative demand associated with this location totals 256.4 kW, exceeding the Regulation 17 threshold by 56.4 kW. Accordingly, approval by the Board of Commissioners of Public Utilities ("Board") of an exemption is required before Hydro may provide the requested service.

Hydro responded to two rounds of requests for information in this proceeding and as explained in its responses, Hydro assessed the request using the customer's stated peak demand of 240 kW and considered that estimate reasonable in the circumstances. Hydro had no basis to conclude that the customer's estimate should be adjusted or that a generic demand factor should be applied to reduce the stated demand. Hydro also submits that it would not be reasonable to assume that the proposed charging equipment would operate exclusively during off-peak periods, particularly given the purpose and intended operation of commercial fast-charging infrastructure.

As Hydro notes in the application, and the responses to requests for information, the proposed connection does not require any special load management or curtailment measures and does not raise reliability concerns for the Labrador West system. While Regulation 17 remains in effect, Hydro reviews requests exceeding the threshold to determine whether they can be accommodated without adversely affecting the reliable operation of the system. Hydro applied that approach in this case and concluded that approval of this request is reasonable and consistent with the purpose of Regulation 17.

Hydro submits that the information filed in this proceeding supports approval of the requested exemption. The proposed connection can be accommodated without adversely affecting reliable service and approval of the request would support reasonable business growth in Labrador while maintaining the objectives underlying Regulation 17. Hydro therefore respectfully requests that the Board approve the application as submitted.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/mc

Encl.

ecc:

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